



MCGEARY CUKOR
INTELLECTUAL PROPERTY LAW

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March 11, 2025

Hon. Cathy L. Waldor
Martin Luther King Jr. Courthouse
50 Walnut Street
Room 4040, Courtroom 4C
Newark, New Jersey 07101

RE: Vision Industries Group, Inc. v. ACU Plasmold, Inc.
Case No.: 2:18-cv-06296-ES-CLW

Dear Judge Waldor:

We represent Plaintiff Vision Industries Group, Inc. (“Vision”) in the above captioned matter and write at the demand of Defendant, ACU Plasmold, Inc. (“ACU”).

This morning, Defendant’s counsel alleged that counsel would be violating its duty of candor to the Court if we did not inform the Court of its criticism of an expert in this case, Mark Lanterman. Exhibit 1.

Mark Lanterman is an expert in computer forensics that has testified in this district and throughout the country on computer forensic issues.

Mr. Lanterman came to be involved in this case because on September 14, 2021, the Court Ordered that Defendant must create an image of the computer of ACU’s employee, John Quach. DE 132.

About a month later, to comply with the Court’s Order, Mr. Miller, on behalf of ACU, hired Mr. Lanterman through his company, Computer Forensic Services. DE 136 (“I contacted Computer Forensic Services, hired them, and started the process of getting them Mr. Quach’s computer.”).

Mr. Lanterman has since submitted two declarations concerning the imaged Quach computer. Mr. Miller, on behalf of ACU submitted the first declaration at DE 146-2. The second declaration (DE 259) was submitted by Vision at the request of the Court for a Certification from Mr. Lanterman to clarify additional information. DE 256.

Apparently, a competitor of Mr. Lanterman has emailed every attorney on the docket and alleged that Mr. Lanterman is a fraud because his biography includes “I completed my post graduate work in cyber security at Harvard University.”

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Mr. Lanterman's competitor, and now Defendant, have alleged that Mr. Lanterman is a fraud because the program he took at Harvard was only a Certificate Program and should have been cited to as "Harvard Online". Exhibit 1.

Even though it was Defendant that first hired Mr. Lanterman, and even though Defendant takes no issue with the substance of the two Lanterman declarations, Defendant has demanded that Plaintiff report this information to the Court and threatened counsel with reporting an ethical violation if we do not comply. Given the seriousness of counsel's allegations, ACU's letter is attached in its entirety.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael Cukor". The signature is fluid and cursive, with a small mark at the end.

Michael Cukor

cc: Counsel of record via ECF